



Isobella Wise
Development Management
Wiltshire Council
Monkton Park
Chippenham
SN15 1ER

1 April 2026

Planning Application Reference: PL/2026/01620
Our reference: MLP26016

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Dear Isobella,

PL/2026/01620 for 'Permission in Principle for the erection of up to 2 no. dwellings' at Land North of West Street, Great Somerford, Chippenham, SN15 5EH

On behalf of **Great Somerford Parish Council**, I am instructed to make representation in respect of the above referenced planning application. The Parish Council **OBJECTS** to the development proceeding.

Reasons for the objection include the following:

- Conflict with the strategic aims of the development plan;
- Development in conflict with the aims of designation of the land as Local Green Space;
- Harm to heritage assets, in particular the Great Somerford Conservation Area;
- Inability to provide safe access and egress onto the highway; and
- Harm to the character and appearance of the area.

Conflict with the strategic aims of the development plan

The development would conflict with the development plan in terms of its strategic policy, being the interrelated Core Policies 1, 2 and 13, in proposing development outside of the limits of development for Great Somerford, with none of the identified policy exceptions to the general policy of restraint in the countryside providing a basis for policy support. Moreover, Policy GSNP1 of the Great Somerford (incorporating Startley) Neighbourhood Plan (GSNP) confirms that there will be a presumption in favour of sustainable development on the allocated sites and others falling within the revised limits of development boundaries, shown on Appendix D2.

Whilst the Council is currently unable to demonstrate a five years' supply of housing, policies of the Framework that protect areas and assets of particular importance can represent strong reasons for refusing development (as will be demonstrated later in this letter). As a result it is submitted that the tilted balance is not operative in this case and in this case the consequence is clear: this application should be refused first and foremost due to the in-principle strategic conflict.

Local Green Space

The site forms of part of a Local Green Space (LGS) identified within the GSNP. LGS is a nationally defined, locally designated policy tool as confirmed in footnote 7 of the Framework. The Framework provides at Paragraph 108 that decisions for managing development within a

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LGS “should be consistent with national policy for Green Belts” – excluding, as clarified at Footnote 45, provisions relating to grey belt and previously developed land. The Parish Council therefore rejects the erroneous suggestion at Paragraph 5.17 of the Applicant’s Statement that *“It is of course also not intended as a nationally restrictive designation, such as Green Belt policy”* – indeed LGS are arguably in fact given more restrictive policy protection than Green Belt, which is subject to loosening provisions in the case of grey belt and previously developed land.

The Parish Council also rejects the insinuation that the LGS set out in the GSNP are in any way lacking in evidence basis. The sites then designated as LGS were considered in the examination of the GSNP and the Independent Examiner found as follows:

“I have visited all the proposed Local Green Spaces. I have also had regard to the full justification shown in Appendix G... I will be recommending that all sites should be indicated using the same shading. I know the criticisms made by Gleeson as it relates to the methodology of the site selection for local green space. I have reflected on the comments but I have enough information before me to conclude that in this case all the proposed local green spaces, in my opinion, do meet the criteria set by paragraph 77 of the NPPF and the additional online guidance in the PPG. I have received no representations from residents that they disagree with the inclusion of any of the sites. The Planning Practice Guidance states that within the criteria given, designation is a matter for local discretion. The guidance affirms that LGS designation should not be a blanket measure for the protection of open countryside adjacent to settlements. I consider that all the sites identified are considered as important by the villagers of Great Somerford and this warrants protection.”

The designation of the LGS remains “a matter of local discretion”, per the Planning Practice Guidance¹, and the Framework’s selection criteria for LGS are substantially unchanged from the time that the GSNP was made. There can be no doubt, therefore, that the LGS was made properly as part of the making of the GSNP.

The development of this LGS, which clearly occupies a prominent position of importance to the local community, would erode the provision of LGS within Great Somerford and would clearly conflict with the purposes of its designation. The loss of LGS to make way for housing would by its nature harm the LGS and as a result this would represent a *strong reason* for refusal. In any event, the Agent does not advance any compliance with national policy for green belt, nor present any Very Special Circumstances.

Local character and the Historic Environment

The site is located within the Great Somerford Conservation Area. This is a designated heritage asset, and conflict with national policy in respect of heritage assets can represent a strong reason for refusal of planning permission for the purposes of Paragraph 11d)i. of the Framework. As set out at NPPF Paragraph 213, any harm to the significance of a heritage asset should require clear and convincing justification. Furthermore, the Council has a duty set out at Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 when performing functions under the planning Acts to pay “special attention... to the desirability of preserving or enhancing the character or appearance of that area”.

The Conservation Area (CA) is characterised by a number of significant green gaps breaking up development throughout the village. The site represents the first such gap on the entrance to the village from the west. Development at the front of this site would eradicate the value of this small green gap.

This part of the CA also prominently features stone walls fronting boundaries, which contributes to the overall sense of distinctiveness of the village. The northern side of West Street features

¹ Available at <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation> Paragraph 013

a substantial length of stone wall, interrupted only for short sections to make way for plot access. Due to the kink in the road, and in the knowledge that the development will need to be able to demonstrate a visibility splay of 2.4 x 43 metres in both directions, it appears highly likely that the stone wall at the front of this site would need to be fully or largely removed (it is in any event dubious that the required visibility can in fact be demonstrated as will be considered later).

Both the stone wall frontage and the green gap are important elements of the village making significant positive contributions to the local character and to the significance of the CA. The Parish Council have no reason to conclude otherwise than that the development would have a harmful impact on the local character and on the significance of the Great Somerford Neighbourhood Plan, and would thereby conflict with Core Policies 57 and 58 of the Wiltshire Core Strategy.

The harm to the significance of the CA is less than substantial. Whilst Core Policy 58 requires that *"Development should protect, conserve and where possible enhance the historic environment"*, the Framework sets out at Paragraph 215 that the harm should be weighed against the public benefits of the proposal. In this instance the Parish Council proposes that development of this site to form two dwellings would not provide public benefits that outweigh the likely harm to be caused to the significance of the CA.

Consequently, it is concluded that the harmful impact on the designated heritage asset would conflict with the Council's Section 72 duty, and the conflict with policies relating to heritage assets would represent a *strong reason* for refusing planning permission.

Highways

As previously noted, the Applicants will be required to demonstrate a visibility splay of 2.4 x 43 metres in both directions. Due to the curvature of the road it is not clear that visibility can be achieved without passing through neighbouring property, outside of the Applicants' control. There is therefore significant doubt as to whether the necessary visibility splay can be delivered. Development at this site would therefore present a significant hazard to road safety. This is an in-principle issue. Refusal on this basis would be consistent with the recent refusal of Application No. PL/2025/06148. The Parish Council would therefore ask Wiltshire Highways to look again at the proposal and consider whether there is a reasonable prospect of the visibility splay being achieved.

The site contains a public right of way (PRoW), Footpath GSOM27. An image is presented within the Applicant's Planning Statement purporting to be from the definitive map, ostensibly demonstrating that the field access to the site and the footpath crossing it is permissive and not part of the PRoW network. This nevertheless is from the Council's online interactive mapping service, which should not be taken as definitive.

Figure 1 overleaf is taken from the up-to-date Wiltshire Council Rights of Way Explorer map, at a different zoom level. By contrast with the Applicants' image this version shows the PRoW very clearly passing through the site.

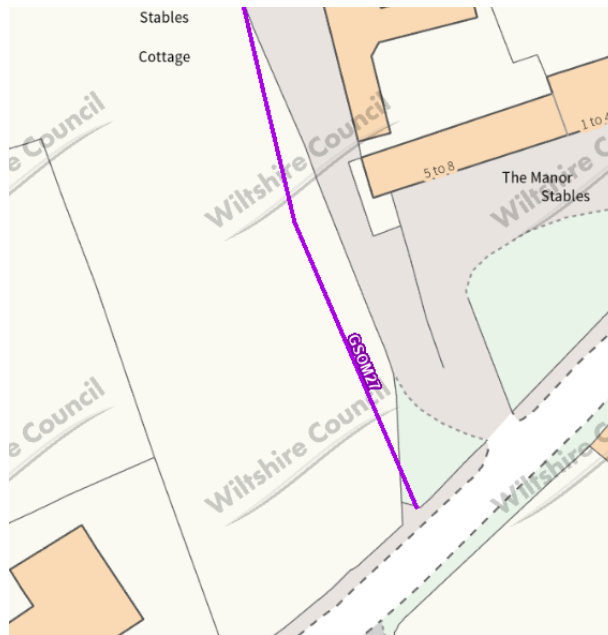


Figure 1: excerpt from Wiltshire Council Rights of Way Explorer²

It is clear that this discrepancy is as a result of unclear publicly available information. The above image is a result of Wiltshire Council rectifying its own erroneously published mapping. While the Applicants cannot be blamed for this, it makes it clear that the site access cannot be as straightforward as they might have imagined. This is particularly true given the curvature of the road and the substantial increase in height a short distance from the roadside. It is very difficult to see how a successful site access can be installed at all, but in particular without infringing on the PRoW.

The PRoW, along with the highway visibility issue, the CA and the LGS represent a significant level of planning constraint, that the very limited information provided within a Permission in Principle application is ill equipped to address. With it being dubious that the tensions involved in these constraints can be adequately resolved, it is the Parish Council's recommendation that the application be refused as these cumulatively raise significant in-principle concerns going beyond simply the planning policy position.

Planning balance

Policies of the Framework that protect areas or assets of particular importance provide strong reasons to refuse planning permission for this development; as a result the 'tilted' balance is not operative in this case. Nevertheless a contrasting 'flat' balance is necessary given the provisions of section 38 (6) of the Planning and Compulsory Purchase Act 2004.

In this case, harm to the application of policies of the development plan, to heritage assets, to LGS, and to highway safety all weigh heavily against permitting the development. It is the Parish Council's submission that the adverse impacts of granting planning permission would profoundly outweigh the benefits. Material considerations do not in this case indicate that the application should be determined otherwise than in accordance with the development plan, and the application should be refused.

Conclusion

The development would conflict with the purposes of the site's designation as Local Green Space, eroding the quality and availability of green space within the village of Great Somerford

² Available at <https://experience.arcgis.com/experience/cae051befa5649fbb318c836afe901c1/page/Page>

and having a harmful impact on the local character and the Great Somerford Conservation Area. Harmful impacts on the LGS and the CA are *strong reasons* for refusing planning permission, and there is no 'tilted balance' operative in this case.

The development is contrary to the overarching strategic policies of the development plan set out at Core Policies 1, 2 and (for the purposes of this area) 13. Due to this significant policy conflict and as there is no tilted balance necessary, the development should be considered unacceptable in principle.

There are significant tensions between highways visibility, the footpath and the historic environment inherent in developing this site. It is not at all clear that these tensions are capable of being resolved satisfactorily. Given the limitations of the Permission in Principle process it is therefore the Parish Council's view that this application should be refused for these reasons as well.

Yours faithfully,

Callan Powers

Callan Powers MPlan
Senior Planner